

APR 14 2015 *id*IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICOMATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CRIMINAL NO. 15-787 JH
)	
vs.)	Count 1: 21 U.S.C. § 846: Attempt to
)	Possess with Intent to Distribute Cocaine; 18
VIDAL SANDOVAL,)	U.S.C. § 2: Aiding and Abetting;
)	
Defendant.)	Counts 2 and 3: 18 U.S.C. § 641; Theft of
)	Government Property.

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1

On or about February 28, 2015, in Colfax County, in the District of New Mexico, and elsewhere, the defendant, **VIDAL SANDOVAL**, unlawfully, knowingly and intentionally attempted to possess with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of cocaine, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

In violation of 21 U.S.C. § 846, and 18 U.S.C. § 2.

Count 2

On or about December 15, 2014, in Colfax County, in the District of New Mexico, the defendant, **VIDAL SANDOVAL**, knowingly and willfully embezzled, stole, purloined and converted to his own use and gain, money of the Federal Bureau of Investigation, a department or agency of the United States, namely, United States currency to which he knew he was not entitled, in an amount the aggregate total of which exceeds \$1,000.00.

In violation of 18 U.S.C. § 641.

Count 3

On or about January 25, 2015, in Colfax County, in the District of New Mexico, the defendant, **VIDAL SANDOVAL**, knowingly and willfully embezzled, stole, purloined and converted to his own use and gain, money of the Federal Bureau of Investigation, a department or agency of the United States, namely, United States currency to which he knew he was not entitled, in an amount the aggregate total of which exceeds \$1,000.00.

In violation of 18 U.S.C. § 641.

FORFEITURE ALLEGATION

Upon conviction of the offense charged herein, the defendant, **VIDAL SANDOVAL**, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendant is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense of conviction.

The property to be forfeited to the United States includes, but is not limited to, the following:

MONEY JUDGMENT


A sum of money equal to at least \$19,500.00 in U.S. currency, including any interest accruing to the date of the judgment, representing the amount of money derived from or involved in the offense(s), or traceable to property involved in the offense(s).


If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), 18 U.S.C. § 982(b), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:



Assistant United States Attorney


/s/
FOREPERSON OF THE GRAND JURY